

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION, INC.,

Plaintiff,

v.

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY,

Defendants.

Case No. 1:16-cv-11950-MLW

JOINT STATUS REPORT

Pursuant to the Court's October 26, 2022 and May 26, 2023 orders (ECF Nos. 149, 166), Plaintiff Conservation Law Foundation and Defendants Exxon Mobil Corporation, ExxonMobil Oil Corporation, and ExxonMobil Pipeline Company respectfully submit the following Joint Status Report.

Since their May 26, 2023 status report, *see* ECF No. 165, the parties have continued to pursue settlement discussions and have exchanged and suggested revisions to proposed settlement terms and related materials. They have made further progress towards reaching a final resolution of the case.

The parties remain hopeful that progress can continue to be made with additional discussion and negotiation. Accordingly, the parties request that they be allowed additional time to pursue settlement. Provided the Court agrees, the parties propose that, by August 4, 2023, the parties report to the Court again regarding the status of their discussions and, if no settlement has been reached by that time, their proposal for how the case should proceed, per the Court's October 26, 2022 order.

DATED: June 27, 2023

CONSERVATION LAW FOUNDATION,
INC.,

By its attorneys,

By: /s/ Elizabeth B. Petersen
Allan Kanner (*pro hac vice*)
Elizabeth B. Petersen (*pro hac vice*)
KANNER & WHITELEY, LLC
701 Camp Street
New Orleans, LA 70130
Tel: (504) 524-5777
Fax: (504) 524-5763
a.kanner@kanner-law.com
e.petersen@kanner-law.com
a.brouk@kanner-law.com

Christopher M. Kilian (*pro hac vice*)
CONSERVATION LAW FOUNDATION, INC.
15 East State Street, Suite 4
Montpelier, VT 05602
(802) 223-5992 x4011
ckilian@clf.org

Margaret Nivison (BBO# 699047)
Alexandra S. Pierre (BBO# 706739)
CONSERVATION LAW FOUNDATION, INC.
62 Summer Street
Boston, MA 02110
(617) 350-0990
mnivison@clf.org
aestpierre@clf.org

Respectfully submitted,

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY,

By their attorneys,

By: /s/ Daniel J. Toal
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
Theodore V. Wells, Jr. (*pro hac vice*)
Daniel J. Toal (*pro hac vice*)
1285 Avenue of the Americas
New York, NY 10019-6064
(212) 373-3000
Fax: (212) 757-3990
twellis@paulweiss.com
dtoal@paulweiss.com

By: /s/ Deborah E. Barnard
Deborah E. Barnard (BBO # 550654)
Jessica R. Early (BBO # 672878)
HOLLAND & KNIGHT LLP
10 St. James Avenue
11th Floor
Boston, MA 02116
(617) 523-2700
Fax: (617) 523-6850
deborah.barnard@hklaw.com
jessica.early@hklaw.com

CERTIFICATE OF SERVICE

I, Daniel J. Toal, hereby certify that, in accordance with Local Rule 5.2(b), the foregoing document was filed through the ECF system on June 27, 2023, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Daniel J. Toal

Daniel J. Toal